

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
VICTORIA DIVISION

UNITED STATES COURTS  
SOUTHERN DISTRICT OF TEXAS  
FILED

JUL 19 2002

Michael N. Milby, Clerk of Court

Michael A. Cotten

versus

CIVIL ACTION NO. *V-02-67*

Citizens Medical Center

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5

2. The plaintiff is:

Address:

County of Residence:

*R-0*  
*mac* Michael A. Cotten

3109 Gayle Drive  
Victoria, Texas 77901-2020

Victoria County

3. The defendant is:

Address:

Citizens Medical Center  
2701 Hospital Drive  
Victoria, Texas 77901-5749

[ ] Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses.

4. The plaintiff has attached to this complaint a copy of the charges filed on May 16, 2001 with the Equal Employment Opportunity Commission.

5. On the date of April 20, 2002 the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Commission; a copy is attached.

6. Because of the plaintiff's:

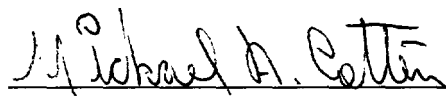
- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin
- (f) ☒ disability

the defendant has:

- (a) ☒ failed to employ the plaintiff
- (b) ☒ terminated the plaintiff's employment
- (c) ☒ failed to promote the plaintiff
- (d) ☒ other: violated Patient Rights

7. When and how the defendant has discriminated against the plaintiff: On April 2, 2001 defendant terminated the plaintiff due to his race and disability.

8. The plaintiff requests that the defendant be ordered:
- (a) ☒ to stop discriminating against the plaintiff
  - (b) ☐ to employ the plaintiff
  - (c) ☒ to re-employ the plaintiff
  - (d) ☒ to promote the plaintiff
  - (e) ☒ demand to be paid in full in the amount of \$3.5 million dollars and that;
  - (f) ☒ the Court grant other relief, including injunctions, damages, costs and lost of wages

  
(Signature of Plaintiff)

Address: 3109 Gayle Drive  
Victoria, Texas 77901-2020  
Telephone: (361) 570-1305